

EXHIBIT 8

March 20, 2025

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES,) Case No.
INC., PASSENGER SEXUAL) 3:23-MD-03084-CRB
ASSAULT LITIGATION)

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO - UNLIMITED JURISDICTION

COORDINATION PROCEEDINGS) Case No.
SPECIAL TITLE (Rule 3.550)) CJC-21-005188
)

In re: Uber Rideshare Cases)

HIGHLY CONFIDENTIAL
ORAL AND VIDEOTAPED DEPOSITION OF
JORDAN BURKE - VOLUME I
March 20, 2025

Reported By: SUSAN ASHE, CER

Job No.: 6834452NE

March 20, 2025

1 A. There were times when I did.

2 Q. Okay. And what would be the type of
3 regulatory issues you managed media campaigns for?

4 A. Can you repeat the question. Sorry.

5 Q. Sure. What were some of the media
6 campaigns on regulatory issues that you managed
7 campaigns for?

8 A. An example would be -- like, when I
9 left -- is a good example -- there was a proposition
10 in California around, sort of, driver independent
11 contractor status.

12 Q. The --

13 A. "Proposition" -- I think it was "22."

14 Q. "Proposition 22."

15 A. Yeah.

16 Q. A ballot to make Uber drivers independent
17 contractors, correct?

18 MS. PHILLIPS: Object to form.

19 A. I don't remember the exact ballot
20 language.

21 Q. Okay. What's your understanding of the
22 ballot language? Or -- scratch that.

23 What's your understanding of the purpose
24 of the initiative?

25 MS. PHILLIPS: Object to form.

1 Go ahead.

2 A. I don't remember enough about it to form
3 kind of an informed opinion.

4 Q. You managed the earned media campaign, and
5 you don't remember enough about it to tell the story
6 about it?

7 A. I left before the campaign actually
8 concluded.

9 So I was more on the front end of coming
10 up with, you know, helping the -- it was part of a
11 coalition, too. It wasn't just, like, Uber -- so it
12 was like Uber, Lyft, and everybody was in a
13 coalition -- helping inform with the research that
14 we were doing -- you know, some of the early
15 messaging around the -- around the initiative.

16 Q. Did any of that messaging include telling
17 voters how often acts of sexual violence occurred on
18 the Uber and Lyft platforms?

19 MS. PHILLIPS: Object to form.

20 A. I don't believe it did, but I don't
21 remember.

22 Q. You'd remember something like that,
23 wouldn't you?

24 MS. PHILLIPS: Object to form.

25 A. Well, I don't remember.

1 Q. Sexual violence is a serious thing, right?

2 A. Yes.

3 Q. And you'd remember telling people that,
4 wouldn't you?

5 MS. PHILLIPS: Object to form.

6 Go ahead.

7 A. In what context?

8 Q. Sure. If you told the people there are
9 hundreds of thousands of acts of sexual violence
10 every day on an Uber platform --

11 MS. PHILLIPS: Objection.

12 Q. Scratch that.

13 If you told the public there are hundreds
14 of acts of sexual violence every day on the Uber
15 platform, you'd remember that, wouldn't you?

16 MS. PHILLIPS: Object to form.

17 Go ahead.

18 A. I don't remember that in this context of
19 this campaign.

20 Q. What were some other -- how much --
21 scratch that.

22 Do you know how much Uber spent on
23 Proposition 22?

24 A. I don't.

25 MS. PHILLIPS: Object to form.

1 Go ahead.

2 A. I don't.

3 Q. Can you estimate?

4 A. I don't know how much Uber spent.

5 Q. But you know that Uber ran -- you ran a
6 multimillion dollar budget, right?

7 MS. PHILLIPS: Object to form.

8 A. On research? Yes.

9 Q. Okay. What about on marketing?

10 A. I didn't run marketing.

11 Q. Okay. But on the -- did you -- you ran a
12 multimillion dollar campaign on research -- scratch
13 that.

14 You ran a multimillion dollar budget on
15 research, right?

16 A. For Prop 22?

17 Q. Yes.

18 A. I don't remember how much we spent on
19 Prop~22 research.

20 Q. More than a million or less than a
21 million?

22 A. I really don't know. I don't remember.

23 Q. That's your testimony, you don't remember?

24 A. I don't.

25 Q. Okay. What were some other campaigns on

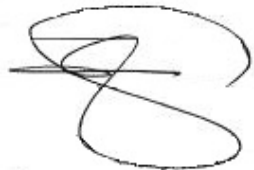
March 20, 2025

1 CERTIFICATE

2
3 I, SUSAN ASHE, a Certified Electronic
4 Reporter and Notary Public, hereby certify that the
5 foregoing is a true and accurate transcript of the
6 deposition of said witness, who was first duly sworn
7 by me on the date and place hereinbefore set forth.

8 I FURTHER CERTIFY that I am neither
9 attorney nor counsel, nor related to or employed by
10 any of the parties to the action in which this
11 deposition was taken, and further that I am not a
12 relative or employee of any attorney or counsel
13 employed in this action, nor am I financially
14 interested in this case.

15 Dated this 31st day of March 2025.

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18


19 Susan Ashe, Notary Public
20 of the District of Columbia
21

22 My commission expires: May 14, 2028.
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